

REMARKS

This application has been amended so as to place it in condition for allowance at the time of the next Official Action.

The Official Action rejects claims 1 and 2 under 35 USC §102(e) as being anticipated by KIM et al. Applicant has canceled the rejected claims, and reconsideration and withdrawal of this rejection are therefore respectfully requested.

The Official Action rejects claims 3, 4, and 12 under 35 USC §103(a) as being unpatentable over KIM et al. in view of KOZAKI et al. Reconsideration and withdrawal of this rejection are respectfully requested for the following reasons:

The Official Action identifies those features of rejected claims 1 and 2 for which the primary KIM et al. reference is offered. As part of such analysis, the Official Action states that the primary KIM et al. device includes an SiO<sub>2</sub> protection layer. The secondary KOZAKI et al. reference is offered as teaching the addition of an alignment layer over the pixel electrode and also in the hole. The various layers deposited by the KOZAKI et al. method cannot be intermixed with the structure or method taught by the primary KIM et al. reference, however.

As best indicated by the preferred embodiment described beginning on line 47 of column 3 of KOZAKI et al., an indium oxide and tin oxide layer are deposited, over which a first alignment layer of silicon dioxide is evaporated. After this, a

second layer made of silicon oxide is evaporated. Finally, a third layer comprising silicon oxide is again deposited.

However, the various layers of silicon dioxide and silicon oxide as taught by KOZAKI et al. are merely alignment layers. They are added successively at various angles to the orientation of the substrate.

However, this cannot reasonably be combined with the teachings of the KIM et al. patent, particularly with respect to the description of formation of the pixel electrode. The alignment layers of KOZAKI et al. have nothing whatsoever to do with the construction of a pixel electrode, which is the context in which the KIM et al. patent teaches the various layers recited by original claims 1 and 2 for which the KIM et al. reference is offered.

If the primary and secondary references could be combined at all, it would be with the pixel electrode construction techniques of the KIM et al. reference, including the use of different materials for the first and second transparent layers. Over all of these layers would be added the multiple alignment layers deposited at various angles, as taught by KOZAKI et al. However, there exists no identified motivation to modify the construction approach offered by KIM et al. to incorporate the materials suggested by KOZAKI et al. in conjunction with an entirely distinct feature of LCD manufacturing technique.

As to the rejection of claim 12, please note that applicant has amended such claim to incorporate the features of allowable claim 13.

The Official Action explicitly notes that claims 5-11 and 13-19 are allowable but for their dependence from rejected base claims.

As discussed above, independent claim 1 now incorporates the features of original claim 3, and is believed to be allowable for the reasons offered above.

Allowable claim 3 is now in independent form, and all the claims that depend therefrom should necessarily be in condition for allowance as well.

In addition to the amendments provided above, applicant has amended claim 4 to recite only indium tin oxide, and added new claim 22, which corresponds to claim 4 but alternatively recites only silicon dioxide.

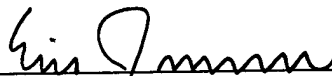
In light of the amendments provided and arguments offered in support thereof, applicant believes that the present application is in condition for allowance and an early indication of the same is respectfully requested.

If the Examiner has any questions or requires further clarification of any of the above points, the Examiner may contact the undersigned attorney so that this application may continue to be expeditiously advanced.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 25-0120 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

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